



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

Molly Joseph Ward
Secretary of Natural Resources

4949A Cox Road, Glen Allen, Virginia 23060
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David K. Paylor
Director

Jeffery Steers
Regional Director

May 30, 2017

Mr. Kevin Smith
Plant Manager
DuPont Teijin Films™ U.S. Limited Partnership
DuPont Teijin Films™ - Mylar® Plant
P.O. Box 27222
Richmond, Virginia 23261

Location: Chesterfield County
Registration No.: 51924

Dear Mr. Kevin Smith:

Attached is a renewal Title V permit to operate your facility pursuant to 9VAC5 Chapter 80 of the Virginia Regulations for the Control and Abatement of Air Pollution.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil penalty. Please read all conditions carefully.

This approval to operate does not relieve DuPont Teijin Films™ U.S. Limited Partnership of the responsibility to comply with all other local, state, and federal permit regulations.

Issuance of this permit is a case decision. The Regulations, at 9VAC5-170-200, provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this permit is mailed or delivered to you. Please consult that and other relevant provisions for additional requirements for such requests.

Additionally, as provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal to court by filing a Notice of Appeal with:

Mr. David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

In the event that you receive this permit by mail, three days are added to the period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for additional information including filing dates and the required content of the Notice of Appeal.

If you have any questions concerning this permit, please contact the regional office at (804) 527-5020.

Sincerely,



James E. Kyle, P.E.
Regional Air Permit Manager

JEK/EDS/51924 DTF-Mylar Plant TV Renewal

Attachment: Permit

The following federal regulation can be found at:
www.gpo.gov/fdsys/search/showcitation.action
40 CFR 63, Subpart JJJJ

cc: Director, OAPP (electronic file submission)
Director, Office of Permits and Air Toxics (3AP10), U.S. EPA, Region III (electronic file submission)
Manager/Inspector, Air Compliance (electronic file submission)



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Federal Operating Permit Article 1

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name: DuPont Teijin Films™ U.S. Limited Partnership
Facility Name: DuPont Teijin Films™ - Mylar® Plant
Facility Location: 5401 Jefferson Davis Highway
Chesterfield County, Virginia
Registration Number: 51924
Permit Number: PRO-51924

This permit includes the following programs:

Federally Enforceable Requirements - Clean Air Act (Pages 5 through 19)

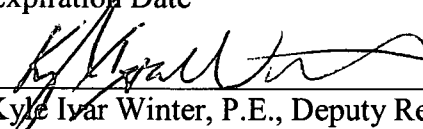
State Only Enforceable Requirements (Pages 20-21)

May 30, 2017

Effective Date

May 29, 2022

Expiration Date



Kyle Ivar Winter, P.E., Deputy Regional Director

30 May 2017

Signature Date

Table of Contents, 1 page

Permit Conditions, 21 pages

Table of Contents

FACILITY INFORMATION	1
EMISSION UNITS	2
PROCESS EQUIPMENT REQUIREMENTS - (EMISSION UNIT ID# MYE01-27, MYT06, MYT08, AND MYT09)	5
NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS: PAPER AND OTHER WEB COATING MACT (40 CFR 63 SUBPART JJJJ) - (EMISSION UNIT ID# MYE20-24)	8
FACILITY WIDE CONDITIONS	11
INSIGNIFICANT EMISSION UNITS	11
PERMIT SHIELD & INAPPLICABLE REQUIREMENTS	12
GENERAL CONDITIONS	12
STATE-ONLY ENFORCEABLE REQUIREMENTS	20

Facility Information

Permittee

DuPont Teijin Films™ U.S. Limited Partnership
DuPont Teijin Films™ - Mylar® Plant
P.O. Box 27222
Richmond, Virginia 23261

Responsible Official

Kevin Smith
Plant Manager

Facility

DuPont Teijin Films™ - Mylar® Plant
5401 Jefferson Davis Highway
Richmond, Virginia 23234
Chesterfield County

Contact Person

Ed VonHoene
Safety, Health and Environmental Manager
(804) 383-3453

County-Plant Identification Number: 51-041-0418

Facility Description: NAICS 326112 and SIC Code 2671

DuPont Teijin Films™ U.S. Limited Partnership (DTF™) coats plastic film, including Mylar® film, with a variety of coatings. The coating process involves affixing a thin, uniform coating to the surface of the film. The process is organized into the following areas: solution prep, coating and drying, recovery, and bulk storage.

The facility is a Title V major source of volatile organic compounds (VOC) and hazardous air pollutants (HAP), specifically toluene. As such, the coating lines are a major source of HAP and are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating (40 CFR, Part 63 Subpart JJJJ). This source is located in an attainment area for all pollutants, and is a PSD minor source.

Emission Units
Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
Mylar® Solution Prep Area 3.6 tons/hr coating solution							
MYE01	MYS01-04 Carbon Bed Adsorbers	Z Side Weigh Tanks	---	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
MYE02-03	MYS01-04 Carbon Bed Adsorbers	Two (2) Z Side Dissolvers	---	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
MYE04-05	MYS01-04 Carbon Bed Adsorbers	Two (2) Z Side Mixer/Blenders	---	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
MYE06-09	MYS09-12 Mixing Room Vents	Four (4) Mix Tanks	2,800 gallon capacity each (maximum rated capacity, 3,000 lbs/hr each)	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
MYE10-11	MYS01-04 Carbon Bed Adsorbers	Two (2) Dissolver Tanks	---	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
MYE12-19	MYS01-04 Carbon Bed Adsorbers	Eight (8) Blenders/Hold Tanks	---	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A
Coating Areas 3.3 tons/hr coated film product							
Plant 2 - Vertical Coaters							
MYE20-23	MYS01-04 Carbon Bed Adsorbers	Four (4) Vertical Coating Drying Lines	Vertical tower coater "G": 0.5856 tons/hr coated Mylar® film product	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	6/9/11 for MYE23

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
	MYS13-14 Coating Room Vents		Vertical tower coaters "H, I, and J": 1.017 tons/hr (combined) coated Mylar® film product				(Ref. No. CTR-VT G) "G" coater only
Plant 1 - R1 Process Horizontal Multi-Station Coater							
MYE24	MYS05-08 Carbon Bed Adsorbers	One (1) Three-Station Horizontal Coating / Drying Line	Horizontal multi-station coater: 1.636 tons/hr coated Mylar® film product	Carbon Bed Adsorbers	MYS05-08 A, B, C, D	VOC HAP	6/9/11 (Ref. No. CTR-HMS)
	MYS15 R1 Room Vent/Exhaust Fan						
MYE25	MYS16-18 Small Lots Tank Vents (3)	Small Lots Tanks	Each tank <2,000 gallons	Carbon Bed Adsorbers (during fill only)	MYS05-08 A, B, C, D	VOC HAP	N/A
Recovery							
1.5 tons/hr THF/toluene							
MYE26	MYS19 Recovery Building Vent/Exhaust Fan	Solvent Recovery Building	1.5 tons/hr THF/toluene	---	---	---	N/A
MYE27	MYS20 Tank Truck Loading Vent	Tank Truck Loading Station	150 gpm pump	---	---	---	N/A
N/A	MYS21 Emergency Vents	Various Emergency Vents	---	---	---	---	N/A
Bulk Storage							
MYT06 (includes former MYT04)	MYS01-04 Carbon Bed Adsorbers	Miscellaneous Storage Tanks	22 tanks Each less than 19,815 gallon capacity with a total capacity of 54,985 gallons. (The capacity of each of	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
and MYT07)			the tanks are either below 2,000 gallon capacity or the vapor pressure of the material stored is less than or equal to 1.5 psia.)				
MYT08	MYS01-04 Carbon Bed Adsorbers	One (1) THF Storage Tank	16,500 gallons (Material stored is greater than 1.5 psia.)	Carbon Bed Adsorbers Submerged Fill Pipe	MYS01-04 E, F, G, H	VOC HAP	6/9/11 (Ref. No. TK THF)
MYT09	MYS01-04 Carbon Bed Adsorbers	Secondary containment tank (could contain THF)	4,500 gallons (Material stored is greater than 1.5 psia.)	Carbon Bed Adsorbers	MYS01-04 E, F, G, H	VOC HAP	N/A

*The Size/Rated capacity and PCD efficiency is provided for informational purposes only, and is not an applicable requirement.

Process Equipment Requirements - (MYE01-27, MYT06, MYT08, and MYT09)

1. **Process Equipment Requirements - (MYE01-27, MYT06, MYT08, and MYT09) - Limitations -**
Film Plant VOC emissions shall be controlled by carbon bed adsorbers (MYS01-08). The carbon adsorption system shall be equipped with a device, which measure the VOC concentration of the exhaust gas and an exhaust gas flow meter. The instruments shall be calibrated as recommended by the manufacturer for the service in which they are installed. The carbon bed outlet VOC concentration shall not exceed 50 ppm before triggering a switch to a fresh bed.
(9 VAC 5-80-110 and Condition E.13. of the 5/30/96 RACT Agreement)
2. **Process Equipment Requirements - (MYE01-27, MYT06, MYT08, and MYT09) - Limitations -**
The VOC control efficiency of the film plant processes shall be a minimum of 98.3% on a six-month rolling average basis. This efficiency shall be verified by mass balance methods described or referenced in Condition 11c.
(9 VAC 5-80-110 and Condition E.15. of the 5/30/96 RACT Agreement)
3. **Process Equipment Requirements - (MYT08 and MYT09) - Limitations -** Volatile organic compound (VOC) emissions from the THF and the #3 secondary containment (MYT08 and MYT09) storage tanks shall be controlled by the use of a submerged fill pipe (except for MYT09) and a four-bed carbon adsorption recovery system. The carbon adsorption system shall achieve at least a 95% control efficiency for VOC emissions, calculated as a monthly average, from the THF and the #3 secondary containment (MYT08 and MYT09) storage tanks as determined by a material balance calculation method similar to that specified in Condition 10. The submerged fill pipe system (solely for MYT08) and the carbon adsorption system shall be provided with adequate access for inspection and shall be in operation when the THF and the #3 secondary containment (MYT08 and MYT09) storage tanks are being filled.
(9 VAC 5-80-110, 9 VAC 5-40-3430, 9 VAC 5-40-3440 and Condition 2 of the 6/9/11 NSR permit)
4. **Process Equipment Requirements - (MYE23) - Limitations -** Volatile organic compound (VOC) emissions from the vertical tower "G" coater (MYE23) shall be controlled by a four-bed carbon adsorption recovery system. The four-bed carbon adsorption recovery system shall be provided with adequate access for inspection and shall be in operation when the vertical tower "G" coater is operating.
(9 VAC 5-80-110 and Condition 3 of the 6/9/11 NSR permit)
5. **Process Equipment Requirements - (MYE24) - Limitations -** Volatile organic compound (VOC) emissions from the multi-station coater (MYE24) shall be controlled by a four-bed carbon adsorption recovery system. The four-bed carbon adsorption recovery system shall be provided with adequate access for inspection and shall be in operation when the multi-station coater is operating.
(9 VAC 5-80-110 and Condition 4 of the 6/9/11 NSR permit)
6. **Process Equipment Requirements - (MYE01-27, MYT06, MYT08, and MYT09) - Limitations -**
Each of the carbon adsorption systems shall be equipped with a device which continuously measures the VOC concentration of the exhaust gas and which triggers the carbon bed regeneration cycle. Each monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. Each monitoring device shall be provided with adequate access for inspection

and shall be in operation when the respective carbon adsorption system is operating.
(9 VAC 5-80-110 and Condition 5 of the 6/9/11 NSR permit)

7. **Process Equipment Requirements - (MYE20-24) - Limitations** - The production of coated Mylar® film shall not exceed 28,290 tons per year, calculated monthly as the sum of coated film production over the previous consecutive 12 months.
(9 VAC 5-80-110 and Condition 6 of the 6/9/11 NSR permit)
8. **Process Equipment Requirements - (MYE01-27, MYT06, MYT08, and MYT09) - Limitations** - Emissions from the operation of the Mylar® film coating plant shall not exceed the limits specified below:

Pollutant	Lbs./hr	Tons/year
VOC	36.5	159.3

Compliance with these emission limits shall be demonstrated by record keeping in accordance with Condition 10b and d.
(9 VAC 5-80-110, 9 VAC 5-80-260 and Condition 7 of the 6/9/11 NSR permit)

9. **Process Equipment Requirements - (MYE01-27, MYT06, MYT08, and MYT09) - Monitoring** - The permittee shall conduct a monthly inspection of each monitoring device required by Conditions 1 and 6 of this permit to insure the proper operation of each device. The permittee shall maintain records of the results of the monthly inspections and details of any corrective actions taken as a result of these inspections. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five years.
(9 VAC 5-80-110)
10. **Process Equipment Requirements - (MYE01-27, MYT06, MYT08, and MYT09) - Recordkeeping** - The permittee shall maintain records of all emission data and operating parameter necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Piedmont Region. These records shall include, but are not limited to:
- Monthly VOC emissions (tons) from the Mylar® film coating plant, calculated by a material balance similar to the method prescribed in 40 CFR §60.603 and approved by the Piedmont Region. The material balance shall include terms for monthly beginning and ending VOC inventory and amounts of VOC removed from the system as nongaseous losses.
 - Annual VOC emissions (tons per year) from the Mylar® film coating plant, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
 - The number of hours during the calendar month that the Mylar® film coating plant was operating. The number of hours that the Mylar® film coating plant is operating during the calendar month shall be determined as the sum of plant operating hours in which any Mylar® film coater within the plant was operated.

- d. Average hourly VOC emissions from the Mylar® film coating plant, calculated monthly by dividing the annual VOC emissions over the previous consecutive 12 months by the sum of the number of hours that the Mylar® film coating plant was operating during the previous consecutive 12 months.
- e. The monthly production of coated Mylar® film and the annual production of coated Mylar® film calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- f. Maintenance and calibration records (calibrations, checks, and adjustments) for the VOC emission monitoring device.
- g. Records of the manufacturer's recommendations for carbon bed replacement, and records of actual carbon bed replacement.
- h. Training records required by this permit.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, 9 VAC 5-50-50, Condition 8 of the 6/9/11 NSR permit, and Condition E.14. of the 5/30/96 RACT Agreement)

11. **Process Equipment Requirements - (MYE20-24, MYT06, MYT08, and MYT09) - Testing -**
The permittee shall conduct monthly performance tests by material balance for VOC emissions from the film coating plant to demonstrate compliance with the emission limits contained in Conditions 2, 3, and 8.
- a. Compliance with the annual VOC emission limit in Condition 8 shall be determined monthly from records required by Condition 10 b.
 - b. Compliance with the hourly VOC limits in Condition 8 shall be determined monthly from records required by Condition 10 d.
 - c. Compliance with the VOC control efficiencies requirements of Conditions 2 and 3 shall be determined by a monthly material balance averaged with the preceding five months. Each monthly VOC control efficiency "determination" shall be calculated from the VOC emissions determined for that month from the records required by Condition 10 and the Compliance Provisions section of 40 CFR 60, Subpart HHH (Standards of Performance for Synthetic Fiber Production Facilities 60.600-60.604).
The VOC control efficiencies shall be calculated using the following equation:

$$EFF = \left[1 - \left(\frac{E}{1000} \right) \right] \times 100$$

Where:

EFF = VOC control efficiency.

E = Emissions in pounds per 1,000 pounds of solvent feed.

(9 VAC 5-80-110, Condition 10 of the 6/9/11 NSR permit, and Condition E.3. of the 5/30/96 RACT Agreement)

12. **Process Equipment Requirements - (MYE01-27, MYT06, MYT08, and MYT09) - Reporting -** The permittee shall submit a written report to the Piedmont Region of the results of continuing compliance determinations from Condition 11 a, b, or c that indicate that VOC emissions exceed the emission limits in Condition 8 or that VOC control efficiency was less than that required by Condition 2. These reports shall be submitted quarterly at three-month intervals. If no exceedances occur during a particular quarter, a report stating this shall be submitted semiannually. (9 VAC 5-80-110 F, Condition 11 of the 6/9/11 NSR permit, and Condition E.4. of 5/30/96 RACT Agreement)

Paper and Other Web Coating MACT (40 CFR 63 Subpart JJJJ) – MYE20-24

Emission Standards and Compliance Dates

13. **Paper and Other Web Coating MACT Requirements - MYE20-24 - General -** The web coating lines (MYE20-24) shall be operated in accordance with 40 CFR 63 Subparts A and JJJJ. (9 VAC 5-80-110 and 40 CFR 63 Subparts A and JJJJ)
14. **Paper and Other Web Coating MACT Requirements - MYE20-24 - Emission Standards -** Organic HAP emissions from the web coating lines (MYE20-24) shall not exceed 5 percent of the organic HAP applied for each month (95 percent reduction). (9 VAC 5-80-110 and 40 CFR 63.3320(b)(1))

General Requirements for Compliance with the Emission Standards and for Monitoring and Performance Tests

15. **Paper and Other Web Coating MACT Requirements - MYE20-24 - Monitoring -** For the web coating lines (MYE20-24), the permittee must install, calibrate, maintain, and operate according to the manufacturer's specifications a device that indicates the cumulative amount of volatile matter recovered by the solvent recovery device on a monthly basis. The device must be certified by the manufacturer to be accurate to within +/-2.0 percent by mass. (9 VAC 5-80-110, 40 CFR 63.3350 (a)(2) and 40 CFR 63.3350 (d)(2))

Requirements for Showing Compliance

16. **Paper and Other Web Coating MACT Requirements - MYE20-24 - Compliance -** For the web coating lines (MYE20-24), the permittee shall demonstrate compliance with the emission standard in Condition 14 through a liquid-liquid material balance. The liquid-liquid material balance shall be performed monthly as stated in 40 CFR 63.3370(i)(1) and specified below:
 - a. Determine the mass of each coating material applied on the web coating line or group of web coating lines controlled by a common solvent recovery device during the month.

- b. Determine the volatile organic content of each coating material as-applied during the month following the procedure in §63.3360(d).
- c. Determine and monitor the amount of volatile organic matter recovered for the month according to the procedures in §63.3350(d).
- d. Calculate the volatile organic matter collection and recovery efficiency using the following equation:

$$R_v = \frac{M_{vr} + M_{vret}}{\sum_{i=1}^p C_{vi} M_i + \sum_{j=1}^q C_{vij} M_{ij}} \times 100$$

Where:

- R_v = Organic volatile matter collection and recovery efficiency, percent.
- M_{vr} = Mass of volatile matter recovered in a month, kg.
- M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in §63.3370.
- p = Number of different coating materials applied in a month.
- C_{vi} = Volatile organic content of coating material, i, expressed as a mass fraction, kg/kg.
- M_i = Mass of as-purchased coating material, i, applied in a month, kg.
- q = Number of different materials added to the coating material.
- C_{vij} = Volatile organic content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.
- M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

- e. Calculate the organic HAP emitted during the month using the following equation or an equivalent site specific equation, as approved by Piedmont Regional Office:

$$H_e = \left[1 - \frac{R_v}{100} \right] \left[\sum_{i=1}^p C_{hi} M_i + \sum_{j=1}^q C_{hij} M_{ij} - M_{vret} \right]$$

Where:

- H_e = Total monthly organic HAP emitted, kg.
- R_v = Organic volatile matter collection and recovery efficiency, percent.
- p = Number of different coating materials applied in a month.
- C_{hi} = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.
- M_i = Mass of as-purchased coating material, i, applied in a month, kg.
- q = Number of different materials added to the coating material.

C_{hy} = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

M_y = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in §63.3370.

(9 VAC 5-80-110 and 40 CFR 63.3370(i)(1))

Notifications, Reports, and Records

17. Paper and Other Web Coating MACT Requirements - MYE20-24 - Records - The permittee shall maintain monthly records of all liquid-liquid material balances performed in accordance with the requirements of Condition 16. The records must be maintained in accordance with the requirements of §63.10(b).

(9 VAC 5-80-110 and 40 CFR 63.3410(b))

18. Paper and Other Web Coating MACT Requirements - MYE20-24 - Reports - The permittee shall submit a semiannual compliance report according to 40 CFR 63.3400(c)(1) and (2) to the Piedmont Region. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 and must be postmarked or delivered no later than July 31. This report shall include:

- a. Company name and address.
- b. Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
- c. Date of report and beginning and ending dates of the reporting period.
- d. If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
- e. For each deviation from an emission limitation (emission limit or operating limit) that applies to you, the compliance report must contain:
 - i. The total operating time of each affected source during the reporting period.
 - ii. Information of the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

(9 VAC 5-80-110 and 40 CFR 63.3400(c))

Facility Wide Conditions

19. **Facility Wide Conditions - Limitations** - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:
- Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - Maintain an inventory of spare parts.
 - Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided, including the names of trainees, the date of training, and the nature of the training.

These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Condition 14 of the 6/9/11 NSR permit)

20. **Facility Wide Conditions - Testing** - The permitted facility shall be constructed so as to allow for emissions testing at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.
(9 VAC 5-80-110 and Condition 9 of the 6/9/11 NSR permit)
21. **Facility Wide Conditions - Testing** - If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ.
(9 VAC 5-80-110)

Insignificant Emission Units

22. **Insignificant Emission Units** - The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
MYE28	Aqueous Based Metal Cleaning Units	9VAC5-80-720 A.38	NA	NA

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

(9 VAC 5-80-110)

Permit Shield & Inapplicable Requirements

23. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
NSPS, Subpart VVV	New Source Performance Standards for Polymeric Coating of Substrates	NSPS VVV is not applicable to facilities which coat plastics
MACT, Subpart EEEE	National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)	MACT EEEE is not applicable to storage tanks subject to another Part 63 subpart

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-110 and 9 VAC 5-80-140)

General Conditions

24. **General Conditions - Federal Enforceability** - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9 VAC 5-80-110)
25. **General Conditions - Permit Expiration** - This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
26. **General Conditions - Permit Expiration** - The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
27. **General Conditions - Permit Expiration** - If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)

28. **General Conditions - Permit Expiration** - No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
29. **General Conditions - Permit Expiration** - If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
30. **General Conditions - Permit Expiration** - The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.
(9 VAC 5-80-80, 9 VAC 5-80-110 and 9 VAC 5-80-170)
31. **General Conditions -Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
 - a. The date, place as defined in the permit, and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
(9 VAC 5-80-110)
32. **General Conditions -Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
(9 VAC 5-80-110)
33. **General Conditions -Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than March 1 and September 1

of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31; and
- b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
 - i. Exceedance of emissions limitations or operational restrictions;
 - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
 - iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semi-annual reporting period."

(9 VAC 5-80-110)

34. **General Conditions - Annual Compliance Certification** - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the certification. The time period to be addressed is January 1 to December 31;
- b. The identification of each term or condition of the permit that is the basis of the certification;
- c. The compliance status;
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;
- e. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period;

- f. Such other facts as the permit may require to determine the compliance status of the source; and
- g. One copy of the annual compliance certification shall be submitted to EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3_APD_Permits@epa.gov
(9 VAC 5-80-110)

- 35. **General Conditions - Permit Deviation Reporting** - The permittee shall notify the Director, Piedmont Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to Condition 33 of this permit.
(9 VAC 5-80-110 F.2)
- 36. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall no later than four daytime business hours after the malfunction is discovered, notify the Piedmont Regional Office of such failure or malfunction and within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. Owners subject to the requirements of 9 VAC 5-40-50 C and 9 VAC 5-50-50 C are not required to provide the written statement prescribed in this paragraph for facilities subject to the monitoring requirements of 9 VAC 5-40-40 and 9 VAC 5-50-40. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Piedmont Regional Office.
(9 VAC 5-20-180)
- 37. **General Conditions - Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9 VAC 5-80-110)
- 38. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is ground for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9 VAC 5-80-110)
- 39. **General Conditions - Need to Halt or Reduce Activity not a Defense** - It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
(9 VAC 5-80-110)

40. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1605, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9 VAC 5-80-110, 9 VAC 5-80-190 and 9 VAC 5-80-260)
41. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.
(9 VAC 5-80-110)
42. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality.
(9 VAC 5-80-110)
43. **General Conditions - Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G.
(9 VAC 5-80-110)
44. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350 in addition to an annual permit maintenance fee consistent with the requirements of 9 VAC 5-80-2310 through 9 VAC 5-80-2350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by April 15 of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. The amount of the annual permit maintenance fee shall be the largest applicable base permit maintenance fee amount from Table 8-11A in 9 VAC 5-80-2340, adjusted annually by the change in the Consumer Price Index.
(9 VAC 5-80-110, 9 VAC 5-80-340 and 9 VAC 5-80-2340)
45. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
 - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
 - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;

- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
- d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
- e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90, 9 VAC 5-50-90 and 9VAC5-80-110)

- 46. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. (9 VAC 5-50-20 E and 9 VAC 5-80-110)
- 47. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110)
- 48. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:
 - a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
 - d. Sample or monitor at reasonable times' substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.(9 VAC 5-80-110)
- 49. **General Conditions - Reopening For Cause** - The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of

three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F. The conditions for reopening a permit are as follows:

- a. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- b. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- c. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110)

50. **General Conditions - Permit Availability** - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.
(9 VAC 5-80-110 and 9 VAC 5-80-150)
51. **General Conditions - Transfer of Permits** - No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.
(9 VAC 5-80-110 and 9 VAC 5-80-160)
52. **General Conditions - Transfer of Permits** - In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-110 and 9 VAC 5-80-160)
53. **General Conditions - Transfer of Permits** - In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.
(9 VAC 5-80-110 and 9 VAC 5-80-160)
54. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.
(9 VAC 5-80-190 C and 9 VAC 5-80-260)

55. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9 VAC 5-80-110 and 9 VAC 5-80-80 E)
56. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(9 VAC 5-80-110 and 40 CFR Part 82)
57. **General Conditions - Asbestos Requirements** - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9 VAC 5-60-70 and 9 VAC 5-80-110)
58. **General Conditions - Accidental Release Prevention** - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(9 VAC 5-80-110 and 40 CFR Part 68)
59. **General Conditions - Changes to Permits for Emissions Trading** - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9 VAC 5-80-110)
60. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
- a. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
 - b. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
 - c. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.
(9 VAC 5-80-110)

State-Only Enforceable Requirements

The following terms and conditions are not required under the federal Clean Air Act or under any of its applicable federal requirements, and are not subject to the requirements of 9 VAC 5-80-290 concerning review of proposed permits by EPA and draft permits by affected states.

61. **State-Only Enforceable Requirements - Limitations** - Emissions from the operation of the Mylar® film coating plant shall not exceed the limits specified below:

Toluene	12.5 lbs/hr
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Compliance with this emission limit shall be demonstrated by record keeping in accordance with Condition 62c.

(9 VAC 5-80-110 N, 9 VAC 5-80-300, and Condition 20 of the 6/9/11 NSR permit)

62. **State-Only Enforceable Requirements - Recordkeeping** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content of and format of such records shall be arranged with the Piedmont Region. These records shall include, but are not limited to:

- The number of hours during the calendar month that the Mylar® film coating plant was operating. The number of hours that the Mylar® film coating plant is operating during the calendar month shall be determined as the sum of plant operating hours in which any Mylar® film coater within the plant was operated.
- Monthly toluene emissions from the Mylar® film coating plant, calculated by a material balance similar to the method prescribed in 40 CFR §60.603 and approved by the Director, Piedmont Region. The material balance shall include terms for monthly beginning and ending toluene inventory and amounts of toluene removed from the system as nongaseous losses.
- Average hourly toluene emissions, calculated monthly by dividing the sum of monthly toluene emissions over the previous consecutive 12 months by the sum of the number of hours that the Mylar® film coating plant was operating during the previous consecutive 12 months.

These records shall be available for inspection by the DEQ and shall be current for the most recent two years.

(9 VAC 5-80-110 N, 9 VAC 5-80-300, and Condition 21 of the 6/9/11 NSR permit)

63. **State-Only Enforceable Requirements - Testing** - The permittee shall conduct monthly performance tests by material balance for toluene emissions from the Mylar® coating plant to demonstrate compliance with the emission limits contained in this permit. Compliance with the hourly toluene limits shall be determined monthly from records required by Condition 62c.
(9 VAC 5-80-110 N, 9 VAC 5-80-300, and Condition 22 of the 6/9/11 NSR permit)
64. **State-Only Enforceable Requirements - Reporting** - The permittee shall submit a written report to the Piedmont Region of the results of continuing compliance determinations that indicate that toluene emissions exceed the emission limits in Condition 61. These reports shall be submitted

quarterly at three-month intervals. If no exceedances occur during a particular quarter, a report stating this shall be submitted semiannually.

(9 VAC 5-80-110 N, 9 VAC 5-80-300, and Condition 23 of the 6/9/11 NSR permit)